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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

\$755,831 in United States Currency,

Defendant.

2:25-CV-310-APG-DJA

ORDER GRANTING

**Government's Unopposed Motion to
Extend the Time to Clarify the facts of
Oliver Jair Martinez-Mendez's Motion to
Set Aside Clerk's Default and to Dismiss
the Forfeiture Complaint, ECF No. 23, to
Delay Motion for Entry of Default
Judgment of Forfeiture, ECF No. 16, and
Order.**

(First Request)

The United States of America respectfully moves this Court for an Order extending the time for the government to respond to, and to clarify the facts and statements of, Oliver Jair Martinez-Mendez's Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture Complaint, ECF No. 23, to and including August 11, 2025.¹ The current response deadline is June 10, 2025. This is the first request.

The government believes the clarification will cause Mendez to withdraw the Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture Complaint, ECF No. 23. The government also agrees, per Mendez's request, this Court delay entering the Motion for Entry of Default Judgment of Forfeiture, ECF No. 16, until after the resolution of Mendez's motion.

The grounds for extending the time are as follows.

¹ LR IA 6-1(a) and (c).

1 The government must obtain permission to provide documents to Mendez. The
2 government does not know how long it will take to obtain permission because it is not
3 within the government's control to grant permission to provide the documents. As soon as
4 the government receives permission, it will provide the documents to Mendez. The
5 government hopes this time extension will also provide Mendez sufficient time to review the
6 documents and to withdraw the motion. If Mendez needs more time, the government agrees
7 to extend the time. The parties have also agreed to obtain a protective order in this case for
8 the documents when they are provided.

9 On May 30, 2025, Mendez's counsel, Richard Wynn, Wynn Law Group, agreed to
10 this extension of time. The extension of time benefits both parties and this Court.

11 This Motion is not submitted solely for the purpose of delay or for any other
12 improper purpose.

13 This Court should grant an extension of time to, and including, August 11, 2025, for
14 (1) the government to respond to the Motion to Set Aside Clerk's Default and to Dismiss
15 the Forfeiture Complaint and (2) for Mendez to respond to the Motion for Entry of Default
16 Judgment of Forfeiture.

17 DATED: June 2, 2025.

18 SIGAL CHATTAH
19 United States Attorney

20 /s/ Daniel D. Hollingsworth
21 DANIEL D. HOLLINGSWORTH
22 Assistant United States Attorney

23 IT IS SO ORDERED:

24 Dated: June 3, 2025

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27 _____
28 ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT COURT JUDGE